

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HECTOR ESCALET, on Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

CANADA DRY POTOMAC CORP.,

Defendant.

**Civil No. 2:23-cv-00329-MMB**

**JOINT MOTION TO APPROVE FLSA SETTLEMENT AGREEMENT**

Plaintiff Hector Escalet, on behalf of himself and all Eligible FLSA Collective Members who choose to participate, and Defendant Canada Dry Potomac Corp. have reached a settlement agreement finally resolving all remaining claims and defenses asserted in this Fair Labor Standards Act collective action case. *See* Settlement Agreement, attached as **Exhibit 1-A** (“Settlement”).

The Parties’ Settlement is a fair and reasonable resolution of a bona fide FLSA dispute, and it does not frustrate the FLSA’s purposes. If court approval is required to effectuate this FLSA Settlement, all elements favor approval. For the reasons set forth in their Memorandum, **Exhibit 1**, the Parties respectfully request this Court’s Order approving the Settlement.

Respectfully submitted,

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/s/ Tracey F. George

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CERTIFICATE OF SERVICE

I certify that I filed the foregoing Joint Motion To Approve FLSA Settlement Agreement via the Court's CM/ECF system on July 19, 2024, which affected service on all counsel of record in this case.

/s/ Tracey F. George

Tracey F. George